

KPSC 2003-00105

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**SouthEast Telephone, Inc., Complainant v.
BellSouth Telecommunications, Inc.,
Defendant**

**BellSouth's Responses to the Commission
Staff's First Data Request to BellSouth
Telecommunications, Inc., dated August 5,
2003**

Filed: September 4, 2003



BellSouth Telecommunications, Inc.
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September 4, 2003

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

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PUBLIC SERVICE
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Re: SouthEast Telephone, Inc., Complainant v. BellSouth
Telecommunications, Inc., Defendant
PSC 2003-00105

Dear Mr. Dorman:

Pursuant to the Commission Staff's First Data Request to BellSouth Telecommunications, Inc., dated August 5, 2003, enclosed for filing are the original and five (5) copies of BellSouth's Responses.

Very truly yours,


for Dorothy J. Chambers


Enclosures

cc: Parties of Record

503764

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 4th day of September 2003.


Cheryl R. Winn

Hon. Jonathan N. Amlung
1000 Republic Bldg.
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Darrell Maynard
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REQUEST: Explain how the Federal Communications Commission's ("FCC") order in CC Docket No. 99-200 concerning Numbering Resource Optimization requires BellSouth to implement 11-digit dialing for certain Land to Mobile ("LTM") calls. Include a discussion of the feasibility of any alternative measures available for complying with the FCC's ruling. Provide any internal documents BellSouth relied upon to determine proper compliance with this ruling.

RESPONSE: As part of the FCC Order for Number Resource Optimization in Docket 99-200, the FCC ordered Wireless Telephone Number Pooling to be effective November 24, 2002 and also required wireless number porting by November 24, 2003. BellSouth's LTM option is implemented through a combination of call routing and billing system treatment. In order to fully understand the impact of the FCC's wireless number pooling order, it is helpful to understand BellSouth's standard dialing plan for the LTM option and how that plan is impacted by wireless number pooling and porting.

BellSouth's standard dialing plan requires that local calls be dialed by 7 digits for intra-NPA calls or 10 digits for inter-NPA calls within the same LATA and 1+ 10 digits for long distances calls. Prior to the FCC order on wireless number pooling and porting, BellSouth routed calls to an NPA-NXX having an LTM option using the standard local dialing plan. Since all 10,000 numbers associated with an NPA-NXX were treated the same, it was simple to build exception translations in each end office to route calls to an LTM-optioned NPA-NXX using 7 digits (or 10 digits for inter-NPA calls). Calls originating from numbers served by BellSouth and terminating in the LTM optioned NPA-NXX are recorded (or not recorded) depending upon the local calling plan of the originating subscriber. All recorded usage is billed to the subscribing wireless company at the rates prescribed in BellSouth's General Subscriber Service Tariff (GSST) Section A.35 rather than being billed to the originating BellSouth subscriber.

With the advent of wireless number pooling and porting, scenarios will arise that necessitate changes for calls that were previously sent to

RESPONSE (CONT.):

LTM optioned NPA-NXXs under a local (7 or 10 digit) dialing plan. The resulting changes require 1+ 10 digit dialing be implemented on these LTM optioned NPA-NXX since all 10,000 numbers associated with an NPA-NXX can no longer be routed the same. For example, it will be possible for a number that had been associated with a LTM optioned NPA-NXX to be ported to another carrier with no LTM option being subscribed to for the ported number. In such a circumstance, calls originated outside the rate center of the ported number would be treated as long distance calls and therefore require 1+ calling to reach the intended customer. Were a caller allowed to dial 10 digits to reach this number, the calling party would be assessed a long distance usage charge for such a call despite not having dialed a 1+ prefix. Also, customers that have selected toll restrictions for their telephone service would now be able to make long distance calls by dialing the 10-digit number. Such an exception is inconsistent with today's 1+ prefix requirement for long distance calls and provides further confusion to the originating party.

To prepare for this pooling and porting eventuality, BellSouth initiated translation changes that required the standard calling plan for long distance calls (i.e. 1 + 10 digits) to ensure appropriate delivery and billing of calls to numbers that would no longer be included in the LTM optioned NPA-NXX. However, to continue the LTM option for wireless carriers subscribing to the service, BellSouth implemented modifications to its billing systems to include "guide numbers" that in conjunction with Local Routing Number (LRN) allowed for BellSouth to continue reverse billing to wireless carriers for LTM optioned numbers where BellSouth carries the call.

It is the pooling and porting of telephone numbers from carrier to carrier that creates a situation that makes it impossible to continue call routing based upon an entire NPA-NXX. To avoid the conflicts created by porting of numbers from carrier to carrier and from LTM option to no LTM option, it would be necessary to translate calls at the single number level as opposed to the NPA-NXX (10,000 number level). Such a level of translations is impractical and outside the realm

REQUEST: Are the dialing requirements for any other service providers besides wireless services affected by these changes? If yes, identify the service providers and explain how end-users may be affected.

RESPONSE: This LTM Option was designed as an offering only for Wireless carriers to receive calls from BellSouth end users; therefore, the required dialing plan changes only affect calls to wireless companies that have the LTM option.

REQUEST: Refer to BellSouth's Wireless Customer Guide, Issue 10, March 3, 2003, Section 4.7, Optional Land to Mobile Service. (Excerpt attached hereto as Attachment A.) This document is available from BellSouth's interconnection Web Site at <http://www.interconnection.bellsouth.com/>

- a. See Section 4.7.2. Can the "guide numbers" and the location routing number be configured in such a way as to allow 10-digit dialing for LTM calls? If not, explain the limitations.
- b. Section 4.7.3 mentions "the BellSouth standard dialing plan." What is BellSouth's "standard dialing plan"?
 - 1) What are the implications when calls conform to this plan?
 - 2) What are the implications when calls do not conform to this plan?
- c. Discuss the issue addressed at Section 4.7.3 in the last sentence, stating that a "landline subscriber must dial 1 + 10 digits to complete calls to a LTM NXX served by different NPAs." [Emphasis added]. Explain what dialing requirements are contemplated for an LTM NXX served by the same Numbering Plan Area.

RESPONSE: a. No. The "guide numbers" and the location routing number ("LRN") cannot be used to allow 10-digit dialing for LTM calls. The "guide number" is used exclusively by BellSouth in its billing system and is not part of the end office switch call routing process. Since this is not part of the call routing process, it cannot be used to allow 10-digit dialing for LTM calls.

RESPONSE (CONT.):

- b. As stated in response to Item Number 1, BellSouth's standard dialing pattern is 7 or 10 digit dialing for local calls and 1+ 10 dialing for long distance calls.

- 1) When calls appropriately adhere to the standard dialing pattern, proper call records are generated and proper routing of calls is handled so that all carriers are able to route calls and bill their customers appropriately.

With regard to LTM in a standard dialing pattern arrangement, a billing solution is required in order to retain LTM in a wireless number pooling and porting environment. BellSouth eliminated the local dialing patterns (7 or 10 digit) for all intraLATA toll calls originating from BellSouth served numbers within the LATA because the network can no longer recognize when the LTM feature is applied. The dialing pattern requires the originating customer to dial the LTM number in accordance with the standard network dialing pattern associated with the assigned LTM NPA-NXX rate center. This change in dialing pattern is necessary since the LTM designation for an NPA NXX code does not guarantee that all numbers within the code will receive LTM treatment.

- 2) With implementation of wireless local number pooling and porting, entire NPA-NXX codes are no longer available for designation as having the LTM feature. Inappropriate billing would occur if BellSouth continued to allow 7 or 10 digit dialing for all LTM calls. There is only one instance in which the LTM call would be billed correctly. If the BellSouth end user originating the LTM call (7 or 10 digit dialed) has also chosen BellSouth as their intraLATA long distance provider (BellSouth LPIC customer), the call will be billed correctly. In that scenario, BellSouth's billing system LTM guide file ensures the call to be billed

REQUEST: Refer to BellSouth's notice to the Commission dated June 11, 2003 wherein BellSouth advised the Commission of central office translation errors that occurred when converting LTM calls from 7-digit dialing. According to later filings made by BellSouth, the translations expanded the dialing requirements from 7-digit to 11-digit, but failed to "block" 7-digit calls.

- a. What are the implications if 7-digit calls remained" un-blocked"?
- b. Can 7-digit calls be blocked but 10-digit calls be allowed?

RESPONSE:

- a. If 7-digit calls remained unblocked and individual numbers in the LTM NXX were ported to a non-LTM service provider, the originator of the call would be billed for an intraLATA toll call without prior knowledge that they had dialed a long distance call (the ported number). Incorrect billing will occur for all calls to that NXX except for BST end users LPIC to BST calling LTM enabled numbers.
- b. If the call is allowed on a 10-digit basis the same restriction applies. Customers dialing any ported number within the LTM NXX would be billed for a long distance call with no prior knowledge that the number in question was no longer local.

REQUEST: In its response, BellSouth advises that the "change was made to prepare the network for the implementation of number pooling and porting, while allowing toll calls to be processed by the customer's chosen local toll carrier and maintaining the traditional 1+ dialing plan for toll calls."

- a. Explain why 1+ dialing in this situation must now be maintained when 7-digit dialing was the norm prior to the change.
- b. Was the LTM tariff that allowed 7-digit dialing with reverse toll billing in violation of any rules of this Commission or the FCC?
- c. Would 10-digit dialing be in violation of any such rules?

RESPONSE:

- a. As stated in response to Item Number 1, the only solution to retain LTM in a wireless number pooling and porting environment requires BellSouth to eliminate local dialing patterns (7 or 10 digit) for all intraLATA toll calls originating from BellSouth served numbers within the LATA.
- b. At the time of its filing the LTM tariff offering was properly filed and approved by the Kentucky PSC, and to BellSouth's knowledge did not violate any Commission or FCC rules. Subsequently the FCC's requirements for number pooling and portability made changes to the offering necessary.
- c. 1+10 digit dialing for the LTM Option does not violate any rules of the FCC or the Kentucky Commission. However, 10 digit dialing without the 1+ does not meet the BellSouth requirements to render a correct bill to allow BellSouth to retain the LTM Option service. Additionally, confusion for callers will result because the caller will receive a toll charge when dialing a 10-digit number that is no longer associated with LTM service.

- REQUEST: Explain in detail, similar to the explanations provided in BellSouth's response at pages 4-8, how an LTM call from a customer subscribing to Area Calling Service continues to be dialed with 7-digits and with no toll charge billed.
- a. Identify and discuss the specific routing elements utilized by BellSouth to facilitate this type of call.
 - b. Compare these elements with those used when routing calls from a customer who does not subscribe to Area Calling Service.

RESPONSE:

- a. Area Calling Service is an optional offering that provides local calling from a BellSouth subscribers' home wire center to all exchanges within the Full Local Calling Area, which include the Limited Local Calling Area exchanges and Additional Exchanges, as described in A3.6.1 of the GSST.

If the BellSouth landline customer subscribes to Area Calling Service, and the NPA-NXX-XXXX dialed by the subscriber, is located in an exchange within the customer's expanded local calling area, the call is and will continue to be dialed on a 7-digit dialing basis. It is irrelevant whether the dialed NPA-NXX has the LTM feature or does not have the LTM feature. This call will be dialed on a 7-digit basis and will be billed as described in the GSST.

- b. A customer who does not subscribe to Area Calling Service would follow the routing elements as detailed in the 1+10 digit dialed calls for a Landline Customer LPIC'd to BellSouth or a Landline Customer LPIC'd to other than BellSouth.

REQUEST: Discuss the feasibility of permitting 10-digit dialing for LTM calls only when the wireless service provider subscribes to BellSouth's LTM service with reverse toll billing and the call is therefore carried over BellSouth's toll network to the wireless service provider's switch. If not feasible, identify and discuss the specific limitations that would prohibit this arrangement.

RESPONSE: With WLNP, any given number within an LTM NXX may have the option of changing from the wireless service provider subscribed to BellSouth's LTM service with reverse toll billing to a wireless service provider or wireline Competitive Local Exchange Carrier (CLEC) not so subscribed. Allowing customer's to dial 10 digits to reach numbers that may potentially result in toll billing would make the continued use of 10 digit dialing not feasible.

In addition, see the response to Item No 1.